

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GLEN CRAIG,	: No. 16 Civ. 5439 (JPO)
	:
Plaintiff,	:
	:
-against-	:
	:
UMG RECORDINGS, INC., KINGSID	:
VENTURES, LTD., and ESTATE OF RILEY	:
B. KING,	:
	:
Defendants.	:
-----X	:

DECLARATION OF BARRY I. SLOTNICK IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT AND PARTIAL SUMMARY JUDGMENT

I, **BARRY I. SLOTNICK**, declare as follows:

1. I am a partner at the law firm Loeb & Loeb LLP, attorneys for defendants UMG Recordings, Inc., Kingsid Ventures, Ltd. and Estate of Riley B. King (collectively, "Defendants"). I am fully familiar with the facts set forth herein and respectfully submit this declaration in support of Defendants' motion for sanctions.

2. Attached hereto as **Exhibit A** is a true and correct copy of excerpts from the June 1, 1970 issue of Changes Magazine.

3. Attached hereto as **Exhibit B** is a true and correct copy of a certificate of registration for registration number VAu 1-159-683 and a certified copy of the work deposited with the Copyright Office for registration number VAu 1-159-683.

4. Attached hereto as **Exhibit C** is a true and correct copy of a June 4 2014 through June 23, 2014 email exchange between Plaintiff and Ryan Null, a photo archivist at UMGI.

5. Attached hereto as **Exhibit D** is a true and correct copy of a November 18, 2014 letter from Benjamin S. Thompson, Esq. to Universal Music Group, Inc.

6. After receiving the November 18, 2014 letter, Defendants attempted to resolve Plaintiff's claims with Mr. Thompson, Plaintiff's initial counsel. Defendants believed that the parties had reached a resolution, but Plaintiff abruptly fired Mr. Thompson, retained his current attorney, and filed this action.

7. Attached hereto as **Exhibit E** is a true and correct copy of the May 1968 agreement between B.B. King Productions, Inc. and ABC Records, Inc.

8. Attached hereto as **Exhibit F** is a true and correct copy of the August 7, 2017 expert report of Michael Einhorn.

9. Attached hereto as **Exhibit G** is a true and correct copy of Plaintiff's October 18, 2016 Federal Rule of Civil Procedure 26(a)(1) Initial Disclosures.

10. Attached hereto as **Exhibit H** is a true and correct copy of Plaintiff's November 25, 2016 Responses and Objections to Defendants' First Set of Document Requests.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: New York, New York
June 25, 2018

/s/ Barry I. Slotnick
Barry I. Slotnick